

# EXHIBIT 1



Dilip Jana &lt;janadilip@gmail.com&gt;

---

**Protective Order [Jana v Walmart]**

---

**Dilip Jana** <janadilip@gmail.com>

Fri, May 2, 2025 at 8:02 PM

To: morgan.jones@gtlaw.com

Cc: peter.wahby@gtlaw.com, Holmes.Hampton@gtlaw.com

Bcc: Dilip Jana &lt;janadilip@gmail.com&gt;

Morgan-

I am fully aware of what I wrote in April 3rd emails and Response brief. Your statement

“you have indicated you want all documents produced during discovery to be publicly available.”

is a misrepresentation of facts and is in bad faith. No where in those documents one can find that statement.

Your response to my email is incomplete and evasive.

Before you bring any discussion about Protective Order, please respond to my question concisely as you are manipulating facts.

Dr. Dilip Jana

800 Fairlawn St, Allen, TX 75002

Ph: 318-243-9743

Email: janadilip@gmail.com

On Fri, May 2, 2025 at 7:47 PM &lt;Morgan.Jones@gtlaw.com&gt; wrote:

Dilip --- Yes, please review your email on April 3rd and your Response in opposition to Walmart's initial motion for protective order. Let us know whether you are agreeable to the entry of a joint protective order in this case or whether you are still opposed to entry of any protective order.

**Morgan Jones**

Associate

Greenberg Traurig, LLP

2200 Ross Avenue | Suite 5200 | Dallas, TX 75201

T +1 214.665.3682 | F +1 214.665.3601

Morgan.Jones@gtlaw.com | www.gtlaw.com | View GT Biography



**From:** Dilip Jana <janadilip@gmail.com>  
**Sent:** Friday, May 2, 2025 7:05 PM  
**To:** Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>  
**Cc:** Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>  
**Subject:** Re: Protective Order [Jana v Walmart]

\*EXTERNAL TO GT\*

Morgan -

Can you please substantiate when and where I said this?

"you have indicated you want all documents produced during discovery to be publicly available."

Kind regards

Dr. Dilip Jana

800 Fairlawn St, Allen, TX 75002

Ph: 318-243-9743

Email: janadilip@gmail.com

On Fri, May 2, 2025 at 2:10 PM <Morgan.Jones@gtlaw.com> wrote:

Dilip — In compliance with Federal Rule of Civil Procedure 26(c), we are reaching out to you in a good faith attempt to resolve the issues underlying Walmart's soon-to-be-filed amended motion for protective order. Walmart seeks entry of a protective order because your discovery requests seek the production of confidential communications, financial information, nonparties' employment records, and commercial information from Walmart and you have indicated you want all documents produced during discovery to be publicly available. Walmart again intends to move for entry of a blanket protective order allowing Walmart (and you) to designate documents as confidential before production to prohibit disclosure of sensitive information to people not involved in the lawsuit.

Are you still opposed to the entry of any protective order in this lawsuit as you have previously indicated? Or did the language in the Court's order entered yesterday (see below) change your opinion? Please let us know. And, so you are aware, Walmart is in the process of preparing certain responsive documents for production and we will provide them to you as soon as possible.

To the extent Jana believes that entry of a protective order would allow Walmart to withhold documents properly requested in discovery, he is mistaken. When the Rule 26(c)(1) standard has been satisfied, a protective order may properly prohibit dissemination of sensitive information to people not involved in the lawsuit without infringing on the right of any party to the lawsuit—here, Jana and Walmart—to review documents exchanged in discovery that are relevant to a party's claim or defense.

**Morgan Jones**  
Associate

Greenberg Traurig, LLP  
2200 Ross Avenue | Suite 5200 | Dallas, TX 75201  
T +1 214.665.3682 | F +1 214.665.3601

Morgan Jones@gtlaw.com | www.gtlaw.com | View GT Biography

